

Sebastian, Manu J.

From: Stephen Cochell <srcochell@gmail.com>
Sent: Tuesday, November 19, 2024 12:21 PM
To: Makarewicz, Valerie (USACAC)
Cc: Sebastian, Manu J.
Subject: Re: [EXTERNAL] U.S. v. Cardiff, Case No. 5:23-00021, Ex Parte Motion to Extend International Travel (Dkt. 125)
Attachments: Order Granting Jason Cardiff's Application to Seal Medical Records and for In Camera Review.pdf; Declaration of Counsel in Support of Jason Cardiff's Application to Seal Medical Records and for In Camera ReviewF.pdf; Jason Cardiff's Application and Motion to Seal Medical Records and for In Camera ReviewF.pdf
Categories: Copied to AMMS, "Cardiff, Jason Edward Thomas (Redwood Scientific Technologies (Cardiff, Jason))"

We are in the process of filing the Notice of Manual Filing and getting the documents to the Clerk.

On Tue, Nov 19, 2024 at 10:52 AM Makarewicz, Valerie (USACAC) <Valerie.Makarewicz@usdoj.gov> wrote:

I'm sorry, on second thought this morning, we would like to see the documents, with any medical confidential information redacted. VLM

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From: Sebastian, Manu J. <Manu.J.Sebastian@usdoj.gov>
Sent: Tuesday, November 19, 2024 2:08:41 AM
To: Stephen Cochell <srcochell@gmail.com>
Cc: Makarewicz, Valerie (USACAC) <VMakarewicz@usa.doj.gov>
Subject: Re: [EXTERNAL] U.S. v. Cardiff, Case No. 5:23-00021, Ex Parte Motion to Extend International Travel (Dkt. 125)

Stephen,

VLM are Valerie's initials that she signs each email with. We continue to oppose this travel extension. We do not oppose you filing evidence in camera for the Court's review.

Thank you.

Manu J. Sebastian

On Nov 18, 2024, at 9:37 PM, Stephen Cochell <srcochell@gmail.com> wrote:

VLM stands for Virtual Location Monitoring? We would agree to VLM or daily checkins with Jack Sherrod assuming he is available.

On Mon, Nov 18, 2024 at 5:59 PM Makarewicz, Valerie (USACAC) <Valerie.Makarewicz@usdoj.gov> wrote:

Ok. We don't oppose VLM

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From: Stephen Cochell <srcochell@gmail.com>
Sent: Monday, November 18, 2024 3:49:40 PM
To: Sebastian, Manu J. <Manu.J.Sebastian@usdoj.gov>
Cc: Makarewicz, Valerie (USACAC) <VMakarewicz@usa.doj.gov>
Subject: Re: [EXTERNAL] U.S. v. Cardiff, Case No. 5:23-00021, Ex Parte Motion to Extend International Travel (Dkt. 125)

Apologies. Just to clarify, we are going to move for in camera inspection of medical records by the Court only. In light of misrepresentations about Dr. Stafford's qualifications as a General Practitioner and generalized attacks on the honesty of counsel as part of the Government's opposition to this motion, we do not think it appropriate for the Government to know the details of Mr. Cardiff's medical condition and medical history.

Let me know if you want to oppose the part of our motion seeking to deny the Government access to the medical records themselves.

We will file this tomorrow a..m.

On Mon, Nov 18, 2024 at 5:04 PM Sebastian, Manu J. <Manu.J.Sebastian@usdoj.gov> wrote:

The government does not oppose.

On Nov 18, 2024, at 4:14 PM, Stephen Cochell <srcochell@gmail.com> wrote:

I trust that you will not oppose a motion to produce the records under seal to the Court. Please confirm.

On Mon, Nov 18, 2024 at 1:30 PM Makarewicz, Valerie (USACAC) <Valerie.Makarewicz@usdoj.gov> wrote:

Hello, here's the government's status report just filed. Thank you, VLM

From: Sebastian, Manu J. <Manu.J.Sebastian@usdoj.gov>
Sent: Monday, November 18, 2024 11:12 AM
To: Stephen Cochell <srcochell@gmail.com>
Cc: Maynor Galvez <Maynor_Galvez@cacd.uscourts.gov>; Makarewicz, Valerie (USACAC) <VMakarewicz@usa.doj.gov>

Subject: Re: [EXTERNAL] U.S. v. Cardiff, Case No. 5:23-00021, Ex Parte Motion to Extend International Travel (Dkt. 125)

Good Afternoon Mr. Galvez,

We understand that an order may be imminent so we wanted to provide notice that the government will be filing a response in the next few minutes that includes PTS's responses.

Thank you

Manu J. Sebastian

On Nov 18, 2024, at 12:46 PM, Stephen Cochell <srcochell@gmail.com> wrote:

Dear Mr. Galvez:

As you know, the Court authorized Mr. Cardiff to travel to his home in Dublin Ireland for fourteen (14) nights. Dkt. 105. In reviewing our Ex Parte Motion to Extend International Travel for Mr. Cardiff due to his health condition (Dkt. 125), it became clear that we had not expressly indicated when Mr. Cardiff left the United States and the deadline for his return. Mr. Cardiff left Houston on November 6, 2024 and his deadline for return to Houston under the Order is Wednesday, November 20, 2024.

We apologize for any confusion regarding the timing. Mr. Cardiff's primary concern is to comply with the Court's Order while addressing his unexpected medical needs.

We appreciate the Court's consideration of this matter.

--
Stephen R. Cochell
The Cochell Law Firm, P.C.
5850 San Felipe, Ste. 500
Houston, Texas 77057
(346)800-3500

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